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September 22, 2023

Hon. Phillip M. Halpern, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601
Via PACER

RE: Johnson, Gregory v Ridgeview Apartments
Docket No.: 23-cv-05295-PMH
Case No.: 7:23-cv-05295
Our Matter No.: 2023107999
Travelers Claim No.: FPS9717

Dear Judge Halpern:

This office is newly appearing in this matter as of September 19, 2023 for the purpose of providing a defense to both defendants under a policy of insurance issued by Travelers Insurance Company. I am the attorney assigned to oversee the case through trial on behalf of both Ridgeview Apartments LLC and Lincoln Apartment Management Limited Partnership.

Yesterday, while reviewing the Pacer/ECF Docket and specifically the August 2, 2023 Disclosure Statement Rule 7.1 (ECF No. 13) and the August 18, 2023 Rule 7.1 Statement (ECF No. 8), I discovered a number of material mistakes in the representations made in those filings. I have since gathered documents which will permit me to correct those mistakes. Because those mistakes may have impacted the Court's August 29, 2023 Order concerning further disclosure of the names and citizenship of the members and partners, I am respectfully requesting that this Court permit the submission of a corrected Rule 7.1 Statement and that the corrected filing be permitted to be filed no later than September 27, 2023. It is further requested that leave be granted to remove the names of the members and partners in the corrected Rule 7.1 disclosure and that such names be submitted directly to the court *in camera* and subject to seal.

Application granted in part and denied in part.

Defendants shall file a list naming all members of Ridgeview Apartments LLC and all partners of Lincoln Apartment Management LP, and identifying the citizenship of those members and partners, by September 27, 2023. Defendants' application is otherwise denied.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
September 25, 2023

It is also respectfully requested that the requirements of the Order of August 29, 2023 and Order extending the time to comply with that order dated September 8, 2023 be stayed until such time as the corrected Rule 7.1 Statement is filed and the court has the opportunity to review and consider the corrected statement. I believe that the corrected statements will meet the requirements of the directive found in that order.

I have advised William Cafaro, the attorney for plaintiff of this filing and application and he has advised that he has no objection.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Joseph H. Green", with a stylized flourish at the end.

Joseph H. Green

cc: William Cafaro